

Congress of the United States  
House of Representatives  
Washington, DC 20515-2506

August 23, 2018

Marlene H. Dortch, Secretary  
Federal Communications Commission  
Office of the Secretary  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Dear Ms. Dortch:

I am submitting this letter in regards to the Petition for Reconsideration filed by Grand River Mutual Telephone Corporation ("GRM" or "the Company") to the Federal Communications Commission ("FCC") for the purposes of requesting that the additional balance of the available Alternative Connect America Cost Model ("A-CAM") funds reported in the July 20, 2018 Public Notice be appropriated to the 747 GRM Missouri study area locations in unserved rural census blocks that do not receive any support for broadband deployment.

As noted in GRM's pending Petition for Reconsideration of the FCC's March 23, 2018 Report and Order, GRM was shut out of a large portion of A-CAM funding. These census blocks were initially eligible, prior to the final offer rate-of-return ILECs on August 3, 2016 but were excluded due to an inadvertent clerical error on GRM's June 2015 Form 477 data.

Upon discovery of this clerical error, GRM revised its Form 477 in September 2016 and filed a petition for waiver seeking inclusion of its revised Form 477 data that would expand the number of A-CAM eligible blocks in its study area. However, the FCC denied that petition.

Subsequently, the high-cost universal service support that GRM could receive and provide to those 747 study locations throughout rural northern Missouri have been excluded. In today's marketplace, it's imperative that businesses have the adequate broadband service to remain competitive, as well as attracting and keeping families in rural Missouri. I would ask that the FCC consider GRM's Petition for Reconsideration of the FCC's March 23, 2018 Report and Order.

If you have any questions, please contact Joe Hegeman in my Kansas City District Office at (816) 792-3976 or [Joseph.Hegeman@mail.house.gov](mailto:Joseph.Hegeman@mail.house.gov).

Sincerely,



Sam Graves  
Member of Congress